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November 6, 1997

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Mr. William F. Caton, Acting Secretary
Federal Communications Commission
Office of the Secretary
1919 M. Street, NW Room 222
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex parte CC Docket No. 96-98, RM 9101 - Implementation of the
Local Competition Provisions of the Telecommunications Act of 1997

Dear Mr. Caton:

On November 5, 1997, Karen Weis, of AT&T, and I met with Radhika Karmarkar, Jake Jennings, Wendy Lader, Brent Olson and Florence Setzer of the Common Carrier Bureau. AT&T reviewed its position of record in the above captioned proceeding using the enclosed material. In particular, the discussion focused on reporting requirements, use of analogs, determining compliance, reporting and auditing and remedies in connection with Service Quality Measurements and performance standards

Two copies of this Notice are being submitted to the Secretary of the Commission in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Very truly yours,

Enclosure

cc: Ms. R. Karmarkar
Mr. J. Jennings
Ms. W. Lader
Mr. B. Olson
Ms. F. Setzer

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Service Performance Measurements

Comparative Measurement Performance, i.e., ILEC measurements compared to CLEC measurements

Adoption of Minimum Set of Measurements

Use of Analogs

Compliance Determination

Reporting and Auditing

Remedies

Adoption of Minimum Set of Measurements

Boundaries Defined Within Which Service Performance Measurements Must Be Selected

- Functional Areas, such as PreOrdering, Ordering & Provisioning, Maintenance & Repair, Billing, Operator Services & Directory Assistance, Network Performance, Interconnection/Unbundled Elements, and General
- Define Minimum Set of Measurement Descriptions
- Requirement That Measurement Definitions Be Concurred In By Parties
 - Measurements Are Not Usable Without Definitions
 - Common Understanding of Definitions Needed For Subsequent Interpretations
 - Undertaken In State Proceedings
- Concurrence In Data Exclusions
- Reporting Dimensions
 - By Service Type (Includes Unique UNE or UNE Combination), Order Activity, Trouble Type, Query Type, Function Interface, Type of Usage

Use Of Analogs

- Analogs Are Presumed To Exist
- Burden Of Proof Rests On The ILEC
- In The Absence Of Retail Analogs, Benchmark Studies Must Be Undertaken
 - Study Is The Responsibility Of The ILEC
 - Studies & Study Results Must Be Reviewed By The Commission & Affected Parties
- If No Study Is Undertaken A Default Benchmark Must Be Assigned

Determination Of Compliance

- Statistical Tests Must Be Used In The Calculation Of Service Performance Results
 - Test Of Means
 - Test Of Variance (Note: Variability Is Used To Determine The Experience Seen By The CLEC's End User Customer)
- Determine Methodologies To Assess ILEC Compliance With Nondiscriminatory Access To OSS, Unbundled Elements, and Interconnection
- Non Compliance Must Be Determined From Reported Results

Reporting And Audits

- Exception Reporting To The Commissions
- Detailed Reporting To CLECs
- Commission Has Right To Scheduled Audits
 - Needed To Verify Accuracy Of Results
 - Can Be Requested By Individual CLECs

Penalties And Remedies

- Determined Based On Degree Of Non Compliance
- Applied By State PSCs
- CLECs Can Claim Damages Under Contracts Held With ILECs